

4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID OWEN RAGER, JR.,

Defendant.

Case: 2:22-cr-20631

Judge: Michelson, Laurie J.

MJ: Grey, Jonathan J.C.

Filed: 11-22-2022 At 12:10 PM

INDI USA V DAVID OWEN RAGER JR (SS)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
DISTRIBUTION OF CHILD PORNOGRAPHY
(18 U.S.C. §§ 2252A(a)(2) and 2252A(b)(1))

On or about June 8, 2021, in the Eastern District of Michigan, the defendant, DAVID OWEN RAGER, JR., knowingly distributed material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and using a means and facility of interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT TWO
POSSESSION OF CHILD PORNOGRAPHY
(18 U.S.C. §§ 2252A(a)(5) and 2252A(b)(2))

Beginning in approximately February 2022 and continuing until on or about August 18, 2022, in the Eastern District of Michigan, the defendant, DAVID OWEN RAGER, JR. knowingly possessed, and accessed with the intent to view, material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A), which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, including a computer, and was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including a computer, in violation of Title 18, United States Code, Sections 2252A(a)(5) and 2252A(b)(2).

FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

Upon conviction of Counts One and/or Two alleged in this Indictment, DAVID OWEN RAGER, JR., shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, constituting or traceable to gross

- profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above-described forfeitable property.

THIS IS A TRUE BILL.

Date: November 22, 2022

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Brandy R. McMillion
BRANDY R. McMILLION
Chief, General Crimes Unit
Assistant United States Attorney

s/Christopher W. Rawsthorne
CHRISTOPHER W. RAWSTHORNE
Assistant United States Attorney

United States District Court
Eastern District of Michigan

Criminal Case Co

Case: 2:22-cr-20631
Judge: Michelson, Laurie J.
MJ: Grey, Jonathan J.C.
Filed: 11-22-2022 At 12:10 PM
INDI USA V DAVID OWEN RAGER JR (SS)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to con

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>CWR</i>

Case Title: USA v. DAVID OWEN RAGER, JR.

County where offense occurred : Wayne and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-mj-30348]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

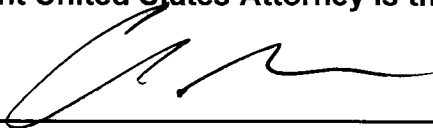
Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 22, 2022
Date


 Christopher W. Rawsthorne
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9160
 Fax: (313) 226-2372
 E-Mail address: christopher.rawsthorne@usdoj.gov
 Attorney Bar #: P84401

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.